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"THE STATION WITH THE RIGHT TOUCH"

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JUN 14 2004

FCC - MAILROOM

June 6, 2004

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: MM Docket No. 99-325

Dear Ms. Dortch,

On behalf of Richardson Broadcasting Corporation (RBC), licensee of WJLD AM (Fairfield), Birmingham Alabama, I am writing in response to the Federal Communications Commission's Further Notice of Proposed Rulemaking in this proceeding and the recent Public Notice about AM nighttime service. WJLD is a Class C AM station currently broadcasting using iBiquity Digital Corporation's HD Radio™ system. RBC is pleased to have had the opportunity to be one of the first stations to implement the HD Radio system in the United States.

RBC strongly supports the FCC's efforts to develop final rules for digital service. RBC has been pleased with the ease of implementation of the HD Radio system and the quality of the digital signal. We believe the improved audio quality of the digital AM signal has the potential to transform the listening public's views of AM radio and to significantly enhance AM radio's ability to compete with new forms of news and entertainment.

We are currently doing on air and online promotion of our HD Radio system. The May 21, 2004 Birmingham Business Journal front-page article entitled "Next big thing for radio: digital broadcasting," highlighted our pioneering efforts. The article also stated that nearly every major broadcast group in the Birmingham market says that they are looking at converting to HD Radio.

The conversion of my station took less than two hours and without any disruption to station operations. Our listeners have been inquiring as to how to purchase the new HD receivers. What is really amazing to me is that we did not lose any coverage or broadcast quality by adding HD Radio. Yet, we still broadcast a robust digital signal.

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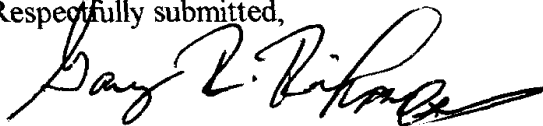
At this early stage in the implementation of digital broadcasting, I believe the FCC must continue its efforts to foster digital conversion. The FCC should authorize full digital nighttime operation for all AM stations. RBC recognizes there is a greater risk of interference to existing analog signals from nighttime operation of the HD Radio system. However, it our understanding that any increased interference will occur primarily at the edge of, or outside of, a station's protected coverage area. RBC believes any impact on listeners in these areas will be greatly offset by the benefits HD Radio technology will offer to the majority of listeners in our primary service area. Existing AM services are severely limited by the inherent problems associated with amplitude modulation. HD Radio technology is the first viable solution to many of AM radio's problems and will ensure the continued success of AM. As a result, RBC is willing to tolerate some increased interference in the short run to derive the full benefits of digital.

It will be difficult for stations to introduce new services or to encourage their listeners to convert to digital if AM broadcasts continue to exclude nighttime service. Our listeners expect continuity of service. It will be difficult to convince listeners that digital is beneficial if those benefits disappear every time the sun sets. RBC encourages the FCC to immediately and permanently authorize AM stations to commence digital broadcasts at night. To the extent that there are instances of harmful interference to adjacent stations, the FCC should encourage and permit stations to work together to resolve interference through creative approaches, including reduction in digital power if necessary. In the event that stations are not willing or able to resolve issues in a cooperative fashion, the FCC's existing complaint procedures can adequately address any unresolved matters.

The FCC's Further Notice proposes many regulations for digital service. RBC believes that digital service should not be burdened with greater restrictions or more regulations than are already imposed on existing analog services. Flexibility at this stage in the rollout of the technology will allow broadcasters and equipment manufacturers to take full advantage of the many benefits offered by HD Radio technology. The FCC should structure its rules to encourage innovation absent evidence of interference to other users.

Richardson Broadcasting Corporation appreciates the opportunity to offer its views on the Commission's proposals and encourages the FCC to expedite its completion of its IBOC rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary R. Richardson", written over the typed name.

Gary R. Richardson  
President